

### REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on April 21, 2003, and the references cited therewith.

Claim 1 was amended. Claims 1-40 are now pending in this application.

### Drawings

Please see the attached formal drawings for correction of informalities with respect to FIG.s 9 and 10. Since no substantive changes were made, no annotated copy is provided.

Claim 1 was amended solely to clarify what was intended with the original language, and not in response to prior art. It is believed that one skilled in the art would have understood the original language, but the amendment does further clarify the meaning, and obviates a need for a change in the drawings.

The Office Action indicates that "numerals (14) and (40) refer to the same optical element in Figs. 1 and 2." These numerals are actually referring to different elements as seen in the following text from the application at page 6, lines 25-26: "In one embodiment, each lens assembly 14 includes a field lens 38 and a projection lens 40." The reference number 14 has an arrow on it, and is meant to point to the combination of field lens 38 and projection lens 40. Thus, numbers 14 and 40 point to different optical elements, and no correction of the drawings is thought to be required.

### §102 Rejection of the Claims

Claims 1-8, 12-14, 17-18, 22-25, 27, 37-38 and 40 were rejected under 35 U.S.C. 102(e) as being anticipated by Itoh et al. (U.S. Patent No. 6,337,724).

The rejection is respectfully traversed on the basis that Itoh does not show each and every element of the claims. Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *In re Dillon* 919 F.2d 688, 16 USPQ 2d 1897, 1908 (Fed. Cir. 1990) (en banc), cert. denied, 500 U.S. 904 (1991). Applicant respectfully submits that the Office Action did not make out a *prima facie* case of anticipation for the following reasons:

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Claim 1 recites that "...each display device is subdivided into a plurality of sections, and each section is configured to display a sectional image...". Itoh does not divide display devices into sections that display a sectional image. The Office Action indicates that the sections are labeled 32 and 33 in Itoh. These are a splitter and mirror respectively. Col. 5, line 44. The splitter and mirror direct light through liquid crystal panels 34 and 35, which are for color and luminance respectively. The images projected through the panels are merged through projection lenses 20 and 21 to form a single image per display device, not sectional images as claimed.

Claim 1 also references that "the plurality of lens assemblies are configured to merge the projected sectional images to form a single tiled image." This element is also lacking in Itoh. First, each set of projection lenses 20 and 21 do not merge sectional images. Rather, they provide color and luminance components of a single image. Adjacent sets of projection lenses in the different display devices each provide a section of the image, but they do not merge the images to form a single tiled image. Rather, each set projects a section of the image, but the images are merged due to the divider 60, separating each of the sections of a screen 1. Itoh indicates that "Since a light shown in dotted line is shielded by the light shielding board 60, in FIG. 2 for instance, the light is not interfered by other light from other liquid crystal module, which helps to generate a clear image." Col. 5, lines 26-29. It is clear that the dividers 60 perform the merging, and not lens assemblies as claimed in claim 1, and claims 2-27, which depend from claim 1.

Applicant reserves the right to identify further differences between Itoh and the claims.

Independent claim 37, along with dependent claims 38-40 also distinguish from Itoh. Claim 37 recites "means for subdividing each display device into a plurality of sections; means for displaying a section image on each section of each display device; and means for projecting the sectional image displayed on each section of each display device onto the screen with the projected images merged into a tiled display." As indicated above, Itoh does not divide each display device into sections, but instead provides only one section. Thus, there can be no means for projecting a sectional image from a display device onto the screen as claimed, nor can there be the means that merges the sections as claimed. Since each and every element of the claimed

Process

invention is not shown in the reference, a prima facie case of anticipation has not been established, and the rejection should be withdrawn.

*§103 Rejection of the Claims*

Claims 9 and 10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al. in view of Hirata et al. (U.S. Patent No. 6,299,313). Since these claims depend from an independent claim that has already been distinguished, and the new reference is not cited as providing elements missing from such independent claim, these claims are also in condition for allowance.

Claims 11, 15 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al. and Hirata et al. as applied to claims 1 and 7 above, and further in view of Sheridan (U.S. Patent No. 5,777,782). Since these claims depend from an independent claim that has already been distinguished, and the new reference is not cited as providing elements missing from such independent claim, these claims are also in condition for allowance.

Claims 19-21 and 39 were rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al. in view of Schwarzenberger (U.S. Patent No. 6,128, 054). Since these claims depend from an independent claim that has already been distinguished, and the new reference is not cited as providing elements missing from such independent claim, these claims are also in condition for allowance.

Claim 26 was rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al. in view of Zimmerman (U.S. Patent No. 5,598,281). Since this claim depends from an independent claim that has already been distinguished, and the new reference is not cited as providing elements missing from such independent claim, this claim is also in condition for allowance.

Claims 28-32 and 34-36 were rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al.. This rejection is also respectfully traversed on the basis that Itoh does not show each and every element of the claimed invention.

This rejection relies on previous rejections of the above claims. As those claims are believed allowable in light of the above remarks, independent claim 28, and dependent claims 29-36 are also believed allowable, as they describe a method of generating a tiled display. Claims 28-36 recite sections for each of a plurality of display devices, which was not shown in

the reference. The claims further recite “displaying a sectional image on each section of each display device” which is also not shown in Itoh. This shows that multiple element of the claim are missing from the reference. Since Itoh does not teach or suggest each and every element of the claims, a prima facie case of obviousness has not been established, and the rejection should be withdrawn.

Claim 33 was rejected under 35 U.S.C. 103(a) as being unpatentable over Itoh et al. in view of Schwarzenberger. Since this claim depends from an independent claim that has already been distinguished, and the new reference is not sited as providing elements missing from such independent claim, this claim is also in condition for allowance.

None of the other references are indicated as providing elements from the independent claims that are missing from Itoh. As such, the rejections should be withdrawn and all the claims allowed.

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6972 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743

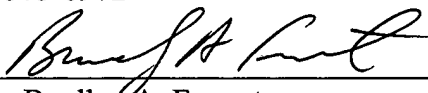
Respectfully submitted,

MATTHEW DUBIN ET AL.

By their Representatives,

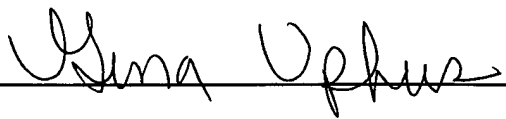
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Date 7-15-2003

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**CERTIFICATE UNDER 37 CFR 1.8:** The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, P.O.Box 1450, Alexandria, VA 22313-1450, on this 15 day of July, 2003.

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